## **EXHIBIT C**

#### 

#### **Providence/Bristol County Superior Court**

#### **Case Summary**

#### Case No. PC-2021-06827

FRANCIS DADDONA v. TARGET CORPORATION	§	Location:	<b>Providence/Bristol County</b>	y
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**Superior Court** 

Filed on: 11/04/2021

**Case Information** 

Case Type: Personal Injury Case Status: 11/04/2021 Unassigned

Case Flags: Claim for Jury Trial

**Party Information** 

MONTI, HENRY S. **Plaintiff** DADDONA, FRANCIS

Retained

**Defendant TARGET CORPORATION** 

**Case Events** 

11/04/2021

Complaint Filed

11/04/2021

Summons

11/04/2021

Claim of Jury Trial Filed

11/09/2021

Summons Proof of Service Filed

#### **Financial Information**

Plaintiff DADDONA, FRANCIS

**Total Financial Assessment** 180.75 **Total Payments and Credits** 180.75 **Balance Due as of 11/22/2021** 0.00 180.75

11/04/2021 Transaction Assessment 11/04/2021 Electronic Payment

Receipt # SCP-2021-017891

(180.75)

Case Number: PC-2021-06827 Filed in Providence/Bristol County Supplied WES-LDA Document 1-3 Filed 11/22/21 Page 3 of 11 PageID #: 15

Envelope: 3358118

Reviewer: Jaiden H.

STATE OF RHODE ISLAND PROVIDENCE, SC.

SUPERIOR COURT

FRANCIS DADDONA

VS.

C.A. NO.

TARGET CORPORATION, Alias John Doe

#### **COMPLAINT**

- 1. The Defendant, TARGET CORPORATION, on or about February 6, 2019 operated a retail store at 371 Putnam Pike, Suite A-250 located at Town, located in the Town of Smithfield, County of Providence, State of Rhode Island, and at all times mentioned herein was in possession and control and operated and maintained said premises as well as managed it.
- 2. That on or about the 6th day of February, 2019 the Plaintiff, FRANCIS DADDONA, was lawfully on the Defendant's said premises in the stock room as he was employed by Northeast Beverage and had just finished stocking and checking his items and was leaving the store through the stock room.
- 3. At the time and place aforesaid, the Defendant was negligent in having maintained the stock room, specifically the area around exit door in a dangerous, defective, unfit, unsafe and negligent manner because among other things there was a open box in the doorway left by Defendant's employee. Also the Defendant was negligent in failing to adequately warn the Plaintiff of said danger and negligent in failing to adequately inspect the premises. As a result of the Defendant's negligence, the Plaintiff was caused to suffer a fall.
- 4. The Defendant knew or should have known that the condition of the stock room near the doorway was dangerous to persons walking on it.
  - 5. The Plaintiff was at all times in the exercise of due care and caution.
- 6. That as a direct and proximate result of the Defendant's negligence, as aforesaid, the Plaintiff sustained personal injuries and emotional harm which incapacitated him, causes him suffering and pain; he incurred, is continuing to incur, and in the future will incur expenses for medical and hospital care and attention; he was unable to perform his usual occupation and lost wages, salaries and/or earnings, and also suffered a loss in earning capacity and scarring of loss of use.

WHEREFORE, the Plaintiff demands judgment against the Defendant, plus costs and interest. The monetary amount claimed is sufficient to establish the jurisdiction of the Superior Court.

Case Number: PC-2021-06827

Filed in Providence/Bristol County Supplied County Supplied County Supplied County Submitted: 11/4/2021 9:57 AM 1 County Supplied County Submitted: 11/4/2021 9:57 AM 1 County Supplied County Supplied S

Reviewer: Jaiden H.

The Plaintiff demands trial by jury.

By Plaintiff's Attorney,

/s/ Henry S. Monti

HENRY S. MONTI, ESQ #2745 GEMMA LAW ASSOCIATES, INC. 231 RESERVOIR AVENUE PROVIDENCE, RI 02907

TELEPHONE: (401) 467-2300 FACSIMILE: (401) 467-8678

E-MAIL: Henry@GemmaLaw.com

DATED: NOVEMBER 4, 2021



#### STATE OF RHODE ISLAND

## SUPERIOR COURT SUMMONS

	Civil Action File Number
	PC-2021-06827
Plaintiff	Attorney for the Plaintiff or the Plaintiff
FRANCIS DADDONA	Henry S. Monti
v.	Address of the Plaintiff's Attorney or the Plaintiff
TARGET CORPORATION	GEMMA LAW ASSOCIATES INC
Defendant	231 RESERVOIR AVENUE
	PROVIDENCE RI 02907
	Tall Bridge
Licht Judicial Complex	Address of the Defendant
Providence/Bristol County	1000 NICOLLET MALL
250 Benefit Street	MINNEAPOLIS MN 55403
Providence RI 02903	
(401) 222-3250	0 0 = 0

#### TO THE DEFENDANT, TARGET CORPORATION:

The above-named Plaintiff has brought an action against you in said Superior Court in the county indicated above. You are hereby summoned and required to serve upon the Plaintiff's attorney, whose address is listed above, an answer to the complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Your answer must also be filed with the court.

As provided in Rule 13(a) of the Superior Court Rules of Civil Procedure, unless the relief demanded in the complaint is for damage arising out of your ownership, maintenance, operation, or control of a motor vehicle, or unless otherwise provided in Rule 13(a), your answer must state as a counterclaim any related claim which you may have against the Plaintiff, or you will thereafter be barred from making such claim in any other action.

This Summons was generated on 11/4/2021.	/s/ Stephen Burke
	Clerk

Witness the seal/watermark of the Superior Court



# STATE OF RHODE ISLAND SUPERIOR COURT

Plaintiff FRANCIS DADDONA	Civil Action File Number PC-2021-06827
v. TARGET CORPORATION	1 C-2021-00027
Defendant	

PROOF OF SERVICE
I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, TARGET CORPORATION, by delivering or leaving said papers in the following manner:
☐ With the Defendant personally.
☐ At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.
Name of person of suitable age and discretion
Address of dwelling house or usual place of abode
Age
Relationship to the Defendant
☐ With an agent authorized by appointment or by law to receive service of process.  Name of authorized agent
If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.
☐ With a guardian or conservator of the Defendant.  Name of person and designation
☐ By delivering said papers to the attorney general or an assistant attorney general if serving the state.
☐ Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.  Name of person and designation



## STATE OF RHODE ISLAND SUPERIOR COURT

Upon a private corporation, domestic or foreign:
☐ By delivering said papers to an officer or a managing or general agent.
Name of person and designation
☐ By leaving said papers at the office of the corporation with a person employed therein.
Name of person and designation
☐ By delivering said papers to an agent authorized by appointment or by law to receive service of process.
Name of authorized agent
If the agent is one designated by statute to receive service, further notice as required by statute was given
as noted below.
☐ I was unable to make service after the following reasonable attempts:
SERVICE DATE:/ SERVICE FEE \$
Month Day Year
Signature of SHERIFF or DEPUTY SHERIFF or CONSTABLE
SIGNATURE OF PERSON OTHER THAN A SHERIFF or DEPUTY SHERIFF or CONSTABLE MUST BE NOTARIZED.
Signature
State of
County of
On this day of, 20, before me, the undersigned notary public, personally appeared personally known to the notary
or $\square$ proved to the notary through satisfactory evidence of identification, which was
, to be the person who signed above in my presence,
and who swore or affirmed to the notary that the contents of the document are truthful to the best of his or her
knowledge.
Notary Public:
My commission expires:
Notary identification number:

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Case Number: PC-2021-06827

Filed in Providence/Bristol County Superior County Superior County WES-LDA Document 1-3 Filed 11/22/21 Page 8 of 11 PageID #: 20 Submitted: 11/4/2021 10:09 AM

Envelope: 3358176 Reviewer: Jaiden H.

STATE OF RHODE ISLAND

SUPERIOR COURT

PROVIDENCE, SC.

FRANCIS DADDONA

VS.

C.A. NO. PC-2021-06827

TARGET CORPORATION, Alias John Doe

#### **REQUEST FOR JURY TRIAL**

Now comes the Plaintiff in the above-entitled matter and request a jury trial.

By Plaintiff's Attorney,

/s/ Henry S. Monti

HENRY S. MONTI, ESQ #2745 GEMMA LAW ASSOCIATES, INC. 231 RESERVOIR AVENUE

PROVIDENCE, RI 02907 TELEPHONE: (401) 467-2300 FACSIMILE: (401) 467-8678 E-MAIL: Henry@gemmalaw.com

DATED: NOVEMBER 4, 2021

Filed in Providence/Bristol County Supplied On WES-LDA Document 1-3 Filed 11/22/21 Page 9 of 11 PageID #: 21

Envelope: 3365267 Reviewer: Jaiden H.

Case Number: PC-2021-06827



# STATE OF RHODE ISLAND SUPERIOR COURT SUMMONS

Plaintiff FRANCIS DADDONA v. TARGET CORPORATION Defendant	Civil Action File Number PC-2021-06827  Attorney for the Plaintiff or the Plaintiff Henry S. Monti  Address of the Plaintiff's Attorney or the Plaintiff GEMMA LAW ASSOCIATES INC 231 RESERVOIR AVENUE PROVIDENCE RI 02907
Licht Judicial Complex Providence/Bristol County	Address of the Defendant 1000 NICOLLET MALL
250 Benefit Street Providence RI 02903	MINNEAPOLIS MN 55403 PLEASE SERVE: CT CORPORATION SYSTEM
(401) 222-3250	450 VETERANS MEMORIAL PARKWAY, SUITE 7A

EAST PROVIDENCE, RI 02914

#### TO THE DEFENDANT, TARGET CORPORATION:

The above-named Plaintiff has brought an action against you in said Superior Court in the county indicated above. You are hereby summoned and required to serve upon the Plaintiff's attorney, whose address is listed above, an answer to the complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Your answer must also be filed with the court.

As provided in Rule 13(a) of the Superior Court Rules of Civil Procedure, unless the relief demanded in the complaint is for damage arising out of your ownership, maintenance, operation, or control of a motor vehicle, or unless otherwise provided in Rule 13(a), your answer must state as a counterclaim any related claim which you may have against the Plaintiff, or you will thereafter be barred from making such claim in any other action.

This Summons was generated on 11/4/2021.	/s/ Stephen Burke	
	Clerk	

Witness the seal/watermark of the Superior Court

Case Number: PC-2021-06827
Filed in Providence/Bristol County Superior County

Reviewer: Jaiden H.



### STATE OF RHODE ISLAND **SUPERIOR COURT**

TO ANIOTO DADONAL	Civil Action File Number PC-2021-06827
TARGET CORPORATION  Defendant	

PROOF OF SERVICE
I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, TARGET CORPORATION, by delivering or leaving said papers in the following manner:
☐ With the Defendant personally.
☐ At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.
Name of person of suitable age and discretion
Address of dwelling house or usual place of abode
题 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Age
Relationship to the Defendant
With an agent authorized by appointment or by law to receive service of process.  Name of authorized agent CT Conformion Thop Box 450 Verent Mem Pkwy E from If the agent is one designated by statute to receive service further notice as required by statute to receive service.
If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.
☐ With a guardian or conservator of the Defendant.  Name of person and designation
☐ By delivering said papers to the attorney general or an assistant attorney general if serving the state.
☐ Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.
Name of person and designation

Case Number: PC-2021-06827
Filed in Providence/Bristol County Superior 61 WES-LDA Document 1-3 Filed 11/22/21 Page 11 of 11 PageID #: 23
Submitted: 11/9/2027 11:03 AM
Envelope: 3365267

Reviewer: Jaiden H.



### STATE OF RHODE ISLAND

#### **SUPERIOR COURT**

Upon a private corporation, domestic or foreign:
☐ By delivering said papers to an officer or a managing or general agent.
Name of person and designation
☐ By leaving said papers at the office of the corporation with a person employed therein.
Name of person and designation
☐ By delivering said papers to an agent authorized by appointment or by law to receive service of process.
Name of authorized agent
If the agent is one designated by statute to receive service, further notice as required by statute was given
as noted below.
☐ I was unable to make service after the following reasonable attempts:
SERVICE DATE: // / 4 / 2/ SERVICE FEE \$
Month Day Year
Signature of SHERIFF or DEPUTY SHERIFF or CONSTABLE
Anthony Cappalli #157
SIGNATURE OF PERSON OTHER THAN A SHERIFF or DEPUTY SHERIFF or CONSTABLE MUST BE
NOTARIZED.
Signature
State of
County of
On this day of, 20, before me, the undersigned notary public, personally appeared personally known to the notary
appeared personally known to the notary
or D proved to the notary through satisfactory evidence of identification, which was
, to be the person who signed above in my presence,
and who swore or affirmed to the notary that the contents of the document are truthful to the best of his or her
knowledge.
Notary Public:
My commission expires:
My commission expires:  Notary identification number:

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